UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

BENEFIT FUNDS.

LOCAL UNION NO. 580 of the INTERNATIONAL
ASSOCIATION OF BRIDGE, STRUCTURAL,
ORNAMENTAL AND REINFORCING IRON WORKERS,
AFL-CIO AND
TRUSTEES OF INTERNATIONAL ASSOCIATION OF
BRIDGE, STRUCTURAL, ORNAMENTAL AND
REINFORCING IRON WORKERS EMPLOYEE

07 CIV 5463 (JSR)

Plaintiffs,

-against -

D.F.S. BROTHERS IRON WORKS, INC. a/k/a D.F.S. BROTHERS STEEL FABRICATORS, and MASPETH STEEL FABRICATORS, INC.,

Defendants.

NOTICE OF PLAINTIFFS' MOTION FOR AN ORDER HOLDING DEFENDANTS IN CONTEMPT

Plaintiffs, LOCAL UNION NO. 580 of the INTERNATIONAL ASSOCIATION OF BRIDGE, STRUCTURAL, ORNAMENTAL AND REINFORCING IRON WORKERS, AFL-CIO AND TRUSTEES OF INTERNATIONAL ASSOCIATION OF BRIDGE, STRUCTURAL, ORNAMENTAL AND REINFORCING IRON WORKERS EMPLOYEE BENEFIT FUNDS, hereby give notice that they will move this Court, the United States District Court of New York for the Southern District of New York before the Honorable Jed S. Rakoff, on December 17, 2007 at 5:00 p.m. at the Courthouse located at 500 Pearl Street, New York, New York for and Order holding Defendants, D.F.S. BROTHERS IRON WORKS, INC. a/k/a D.F.S. BROTHERS STEEL FABRICATORS, and MASPETH STEEL FABRICATORS, INC. in Contempt of Court for their failure and refusal to adhere to and/or comply with the terms of the Court's November 7, 2007 Order.

Answering papers, if any, must be served in the time and manner prescribed by the Federal Rules of Civil Procedures and the Local Rules of the Court.

Dated: December 4, 2007

Respectfully Submitted,

DENIS A. ENGEL

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TO: D.F.S. BROTHERS IRON WORKS, INC. a/k/a
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